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July 20, 2006

Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

Re: MUR 5768

Dear Mr. Norton:

Pursuant to the provisions of 11 C.F.R. 111.6(a), I am writing to respond to the Complaint (the "Complaint") against Boswell for Congress ("Boswell") filed by The Republican Party of Iowa (the "RPofI") with the Federal Election Commission (the "FEC") (MUR #5768).

The Complaint alleges that federal law prohibiting the receipt of corporate in-kind contributions was violated when an invitation was sent out by Jeffrey Stroburg, Chief Executive Officer of West Central Cooperative on West Central letterhead stationery. The Complaint further alleged that there was no reference to any receipt or disbursement to West Central in Boswell's financial disclosures filed with the FEC.

Jeff Stroburg is CEO of West Central Cooperative ("WCC") and is also a member of the West Central Cooperative Political Action Committee ("WCC PAC"). On May 9, 2006, 52 invitations were mailed inviting the recipients to a luncheon reception sponsored by Larry Kallem and the agriculture cooperative community in honor of Congressman Leonard Boswell. These invitations were mistakenly and inadvertently printed on West Central Cooperative letterhead stationery, instead of West Central Cooperative Political Action Committee letterhead stationery. As soon as Jeff Stroburg became aware of this oversight, he immediately took action to correct the mistake by having a WCC invoice mailed to the Boswell for Congress committee, showing total charges of \$59.16 for laser printer usage, stationery, envelopes, postage, labels, and administrative costs. A copy of that invoice is included with this response as "Attachment A." The Boswell for Congress committee remitted payment of \$59.16 to West Central Cooperative, as shown by the photocopy of check number 4856 on Attachment A.

27044162197
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
JUL 31 A 10:00

Lawrence H. Norton, Esq.
July 20, 2006
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West Central Cooperative's motives were entirely innocent in this situation. The use of West Central Cooperative letterhead was mere inadvertence. The costs involved in sending out the invitations (\$59.16) is a very minor amount. That cost was repaid by the Boswell for Congress committee very quickly.

The obvious innocence of motive, the low value of the expenditure of cooperative resources, and the rapid repayment of the services and costs involved in sending out the very few invitations warrant that no action should be taken on the basis of the complaint submitted.

Thank you.

Sincerely yours,


John A. Gerken

JAG/JMM/j
Enclosure

STATE OF Iowa)
) ss:
COUNTY OF Carroll)

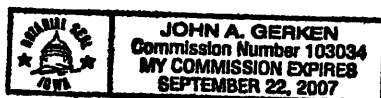
I, Jeff Strobura, Chief Executive Officer of West Central Cooperative and member of West Central Cooperative Political Action Committee, being first duly sworn on oath, depose and state that I have read the above and foregoing response letter and that the allegations and information contained therein are true and correct to the best of my knowledge and belief.

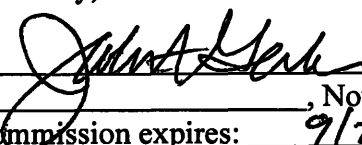
Dated this 21 day of July, 2006.


Jeff Strobura

Subscribed and sworn to before me this 21^{*} day of July, 2006.

(Seal)




_____, Notary Public
My commission expires: 9/22/2007

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27044162199



WEST CENTRAL®

Event: Congressman Boswell Luncheon
Date: Tuesday, May 30, 2006
Time: 12:30 p.m. – 2:00 p.m.
Location: Tournament Club of Iowa
1000 Tradition Drive
Polk City, Iowa

Expenses:

52 Invitations

Cost of laser printer

\$1.04

Stationary

\$2.96

Envelope

\$1.76

Stamps

\$19.24


Labels

\$4.16

Admin Cost

\$30.00

\$59.16

		BOSWELL FOR CONGRESS CARL MCGUIRE, TREAS. 224 S STATE ST LAMONI, IA 50140		72-2240/739 0441139	4856
PAY TO THE ORDER OF		DATE <u>06-26-06</u>			
<u>West Central</u>		<u>\$ 59.16</u>			
<u>Fifty nine dollars and 16/100</u>		DOLLARS			
ASB American State Bank <small>(841) 343-0175 - Osceola IA 50913 (515) 784-0130 - Lamoni, IA 50140</small>		<u>Carl McGuire</u>			
MEMO <u>F/R invitations</u>					